

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 11
)
) Case No. 18-23538 (RDD)
SEARS HOLDING CORPORATION, et al.,) (Joint Administration Pending)
)
Debtors.) Hon. Robert D. Drain
)

**MOTION FOR ADMISSION TO PRACTICE, *Pro Hac Vice*,
BY CREDITOR PENSION BENEFIT GUARANTY CORPORATION
FOR UNITED STATES GOVERNMENT ATTORNEY KELLY R. CUSICK**

I, Kelly R. Cusick, a member in good standing of the bar of the District of Columbia, respectfully request admission, *pro hac vice*, before the Honorable Judge Robert D. Drain, to represent the Pension Benefit Guaranty Corporation ("PBGC"), a creditor in this case. The grounds for this motion ("Motion") are as follows:

The PBGC is a United States Government agency that administers and enforces the pension plan termination program established under Title IV of the Employee Retirement Income Security Act of 1974, *as amended*, 29 U.S.C. §§ 1301-1461(2012 & Supp. IV 2016) ("ERISA"). Under the Local Rules of the Bankruptcy Court for the Southern District of New York, an attorney "in good standing of the bar of any state or of any United States District Court may be permitted to practice in this Court" upon motion to the Court, in compliance with Local Rule 2090-1(b).

My mailing address is: Pension Benefit Guaranty Corporation, Office of the General Counsel, 1200 K Street, N.W., Washington, D.C. 20005.

My e-mail address is: cusick.kelly@pbgc.gov. My telephone number is (202) 326-4020, ext. 6206.

The Pension Benefit Guaranty Corporation is a U.S. Government agency and is therefore exempt from filing fees.

Dated: October 15, 2018
Washington, D.C.

Respectfully submitted,

/s/ Kelly R. Cusick
Kelly R. Cusick
Pension Benefit Guaranty Corporation
Office of the General Counsel
1200 K Street, N.W.
Washington, D.C. 20005
Telephone: (202) 326-4020, ext. 6206
Fax: (202) 326-4112
Emails: cusick.kelly@pbgc.gov and
efile@pbgc.gov